

*Model for Letters of Request recommended for use in applying the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*

**Request for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters**

*N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paragraphs may permit use of English, French or another language.*

*In order to avoid confusion, please spell out the name of the month in each date.*

*Please fill out an original and one copy of this form (use additional space if required).*

1. Sender

United States District Court for the District of  
Massachusetts  
One Courthouse Way  
Boston, MA 02110

2. Central Authority of  
the Requested State

The Israeli Central Authority  
Directorate of Courts  
19 Jaffa Road  
Jerusalem

3. Person to whom the  
executed request is  
to be returned

Lawrence Green, Esq.  
Burns & Levinson, LLP  
125 Summer Street  
Boston, MA 02110

4. Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request

Date

October 1, 2008

Reason for urgency\*

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\* Omit if not applicable.

IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:

5. a	Requesting judicial authority (Article 3, a))	United States District Court for the District of Massachusetts One Courthouse Way Boston, MA 02110
b	To the competent authority of (Article 3, a))	Israeli Central Authority Directorate of Courts 19 Jaffa Road Jerusalem
c	Names of the case and any identifying number	Sheldon G. Adelson v. Moshe Hananel C.A. No.: 04-cv-10357-RCL
6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3, b))		
a	Plaintiff	Sheldon G. Adelson
	Representatives	Franklin H. Levy, Esq. Duane Morris, LLP 470 Atlantic Avenue, Suite 500 Boston MA 02110
b	Defendant	Moshe Hananel
	Representatives	Lawrence G. Green, Esq. Burns & Levinson, LLP 125 Summer Street Boston, MA 02110
c	Other parties	
	Representatives	

\* Omit if not applicable.

7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract.
	b	Summary of complaint
	c	Summary of defence and counterclaim*
	d	Other necessary information or documents*
8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
	b	Purpose of the evidence or judicial act sought
9.	Identity and address of any person to be examined (Article 3, e))*	Itach David 1130 Herzel Street Beith Shemesh
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Itach David will be examined regarding Hananel's work with Adelson (including before December, 1995).

\* Omit if not applicable.

11. Documents or other property  
to be inspected  
(Article 3, g))\*

12. Any requirement that the  
evidence be given on oath  
or affirmation and any  
special form to be used  
(Article 3, h))\*

All deposition testimony is to be given under  
oath.

13. Special methods or procedure  
to be followed (e.g. oral or  
in writing, verbatim,  
transcript or summary,  
cross-examination, etc.)  
(Articles 3, i) and 9)\*

Defendant's counsel is to conduct the  
depositions.

14. Request for notification of  
the time and place for the  
execution of the Request  
and identity and address of  
any person to be notified  
(Article 7)\*

15. Request for attendance or  
participation of judicial  
personnel of the requesting  
authority at the execution  
of the Letter of Request  
(Article 8)\*

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\* Omit if not applicable.

16. Specification of privilege  
or duty to refuse to give  
evidence under the law of  
the State of origin  
(Article 11, b))\*

17. The fees and costs incurred  
which are reimbursable under  
the second paragraph of  
Article 14 or under  
Article 28 of the Convention  
will be borne by\*

DATE OF REQUEST

July 25, 2008

SIGNATURE AND SEAL OF THE  
REQUESTING AUTHORITY



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\* Omit if not applicable.